

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

IN RE TESLA INC. STOCKHOLDER  
DERIVATIVE LITIGATION

§ Lead Case No. 1:22-cv-00592-DAE

§ (Consolidated with Case No. 1:22-cv-00611-  
§ DAE)

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This Document Relates To:

All Cases

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**DECLARATION OF SHANE P. SANDERS IN SUPPORT OF PLAINTIFF'S  
OPPOSITION TO DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S SECOND  
AMENDED CONSOLIDATED COMPLAINT**

I, Shane P. Sanders, hereby declare as follows:

1. I am an attorney duly licensed to practice before all of the courts of California. I was admitted to practice *pro hac vice* before this Court on August 4, 2022. I am a partner at Robbins LLP, co-lead counsel for Alvin Janklow, the plaintiff in the above-captioned action. I submit this declaration in support of Plaintiff's Opposition to Defendants' Motion to Dismiss Plaintiff's Second Amended Consolidated Complaint. I have knowledge of the matters stated herein and, should I be called upon, I could and would testify competently thereto.

2. Attached as Exhibit A is a true and correct copy of a redline version comparing Plaintiff's Verified Amended Consolidated Stockholder Derivative Complaint for Breach of Fiduciary Duty and Violation of Securities Law (ECF No. 76) with Plaintiff's Verified Second Amended Consolidated Stockholder Derivative Complaint for Breach of Fiduciary Duty (ECF No. 97) [***Filed Under Seal***].

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 22nd day of August, 2024.

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*/s/ Shane P. Sanders*

SHANE P. SANDERS (*pro hac vice*)

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 22, 2024, that I have served a true and correct copy of the foregoing document upon each attorney of record.

*/s/ Shane P. Sanders*

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SHANE P. SANDERS